

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ZURU (SINGAPORE) PTE., LTD;  
ZURU LLC  
ZURU INC.,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS, LIMITED  
LIABILITY COMPANIES, PARTNERSHIPS, AND  
UNINCORPORATED ASSOCIATIONS  
IDENTIFIED ON SCHEDULE A TO THE  
COMPLAINT,

Defendants.

Case No.: 21-cv-8101-DLC

*Granted.*  
*Prime*  
*9/30/21*

**PLAINTIFF'S MOTION TO SEAL**

Plaintiffs ZURU (SINGAPORE) PTE., LTD, ZURU LLC, and ZURU INC. (collectively, "Plaintiffs") respectfully submit this application to file under seal the following documents associated with the above referenced action until the hearing on Plaintiff's Application for an Order to Show Cause Why a Preliminary Injunction Should Not Issue or further order of the Court:

- (1) Plaintiff's Schedule A attached to the Complaint, which identifies and includes a list of Defendants' online marketplace websites (hereinafter the "Defendant Internet Stores") and the usernames for the Defendant Internet Stores, and
- (2) screenshot printouts showing the active Defendant Internet Stores (Exhibit 2 to the Declaration of Stephen Drysdale).

Plaintiffs filed their public-record version of the documents redacted and concurrently herewith has provisionally filed the documents electronically under seal.

In this action, Plaintiffs are requesting this *ex parte* relief based on claims for trademark counterfeiting and copyright infringement. Sealing this portion of the file is necessary to prevent the Defendants from learning of these proceedings prior to the entry of a temporary restraining order. If Defendants were to learn of these proceedings prematurely the likely result would be the destruction of relevant documentary evidence and the hiding or transferring of assets to foreign jurisdictions, which would frustrate the purpose of the underlying law and would interfere with this Court's power to grant relief. Once a temporary restraining order has been served on the relevant parties and the requested actions are taken, Plaintiffs will move to unseal this document.

Therefore, Plaintiffs respectfully request that the Court grants Plaintiffs leave to file its Schedule A attached to the Complaint and Exhibit 2 to the Declaration of Stephen Drysdale under seal. *See, e.g., Wowwee Group Ltd. et al v. Meirly, et al*, No. 1:18-cv-00706 Document # 7 (S.D.N.Y. Feb. 5, 2018) (granting application to seal); *Allstar Marketing v. GB Housewear Store, et al*. No. 1:17-cv-07596 Document #22 (S.D.N.Y. Oct. 12, 2017) (same); *Spin Master Ltd. and Spin Master, Inc. v. Alan Yuan's Store, et al* No. 1:17-cv-07422 Document #19 (S.D.N.Y. Oct. 13, 2017) (same); *Kipling Apparel Corp. et al v. Rhys, et al* No. 16-cv-990 Document #14 (S.D.N.Y. Feb. 17, 2016) (same).

Dated: September 29, 2021

Respectfully submitted,  
COLE SCHOTZ P.C.

By: /s/ Michael R. Yellin  
Michael R. Yellin  
1325 Avenue of the Americas  
19th Floor  
New York, New York 10017  
(201) 525-6258  
myellin@coleschotz.com

-and-

THOITS LAW  
Andrew P. Holland, Esq.  
*Pro Hac Vice*  
*Application*  
*Forthcoming*  
400 Main Street, Suite 250  
Los Altos, CA 94022  
(650) 327-4200  
aholland@thoits.com

Attorneys for Plaintiffs, ZURU  
(SINGAPORE) PTE., LTD,  
ZURU LLC, and ZURU INC.